



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2011R00783

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 16, 2015

By Email and FedEx

Michael Bachrach
276 Fifth Avenue
Suite 501
New York, NY 10001

Steve Zissou
Steve Zissou & Associates
42-40 Bell Blvd., Suite 302
Bayside, NY 11361

Re: United States v. Agron Hasbajrami
Criminal Docket No. 11-623 (S-1) (JG)

Dear Sirs:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery materials, consisting of:

- Archives of jihadist websites, disk Bates-numbered 1121;
- Records obtained from Lufthansa, Bates-numbered 1122-1127;
- Printouts of travel services websites, Bates-numbered 1128-1134; and
- A flyer recovered from the defendant's residence pursuant to a search warrant, Bates-numbered 1135.

In addition, on February 24, 2015, the government provided notice of its intent to call Evan Kohlmann to testify as an expert at trial. Enclosed please find Mr. Kohlmann's curriculum vitae. The government noted that Mr. Kohlmann is expected to testify as to, inter alia, the content of certain websites at the time of the events in the government's case; this is expected to include the websites contained on the disk Bates-numbered 1121.

If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
Seth D. DuCharme
Matthew S. Amatruda
Assistant United States Attorneys
(718) 254-6054/6021/7012

Enclosures

cc: Clerk of Court (JG) (w/o enclosures)